

EXHIBIT “E”

DEADLINE

[TIP US](#)[HOME](#) / [FILM](#) / [LEGAL](#)

Justin Baldoni Damns Blake Lively For “Abuse” & “Sham Lawsuit” Seeking Texts, Smear Campaign Evidence; “Nothing To Hide,” Actress’ Lawyers Declare

By [Dominic Patten](#)

April 21, 2025 2:19pm



(L-R) Justin Baldoni and Blake Lively

Getty

Five months after [Blake Lively](#) filed [her sexual harassment and retaliation complaint with California’s Civil Rights Department](#) against her *It Ends With Us* co-star and director [Justin Baldoni](#), his Wayfarer Studios and inner circle, a previously unrevealed subpoena-seeking lawsuit from Lively peels back

DEADLINE

[TIP US](#)

In partial response, we now know that Lively gained the info in the late summer and early fall of last year in a targeted shadow suit of sorts, and the information came from Jonesworks boss Stephanie Jones.

ADVERTISEMENT

Related Stories



In Justin Baldoni-Blake Lively Legal Saga, Publicist Stephanie Jones Rebuts “Specious Allegations” That She Leaked Confidential Information



A Full Timeline Of Blake Lively & Justin Baldoni’s ‘It Ends With Us’ Feud In Court, Online & In The Media

Eventually revealing a treasure trove of what looks on the surface like incriminating and unpalatable texts and other correspondence from Baldoni’s Melissa Nathan– and Jennifer Abel-led PR team, the September 27 filing has been kept under the radar until this past week. Lively’s name (or the name of her spouse Ryan Reynolds) doesn’t appear anywhere on the New York state court suit against 10 unnamed “Does.” Instead, the plaintiff is “Vanzan,” a company we now know was formed in Delaware in 2010 with Lively as CEO and every other officer.

Watch on Deadline

DEADLINE

TIP US

00:55

33:57

“The DOE Defendants have undertaken direct efforts to contravene these agreements and instead have participated, and may continue to participate, in efforts to harm Plaintiff, including by: failing to act in Plaintiff’s best interests, taking actions to their personal benefit at Plaintiff’s expense, failing to freely communicate with Plaintiff regarding matters that impact Plaintiff’s business and reputation, and disclosing to third parties and failing to keep strictly confidential Plaintiff’s confidential and/or private information,” reads the complaint from Manatt, Phelps & Phillips, who are one of the firms representing Lively, Reynolds and their PR chief Leslie Sloane in the open suits against Baldoni and his inner circle.

It’s long since been insisted by Jones and Team Blake that Jones handed over Abel’s cell and other devices to Lively’s attorneys. While Jones gave Lively’s lawyers that device and the material on it upon receiving a subpoena request from Lively’s lawyers, the origin of that subpoena has never been known. In fact, Baldoni lead attorney Bryan Freedman has in the past openly doubted the existence of such a subpoena as the legal conflict between the *It Ends With Us* stars grew.

ADVERTISEMENT

DEADLINE

[TIP US](#)

With a clear tone of more to come, Freedman's not doubting that subpoena anymore. Nor what it all means.

"Ms. Lively's and Mr. Reynolds' company Vanzan had nothing to do with this case and they knew it," Freedman told Deadline on Monday. "This sham lawsuit was designed to obtain subpoena power without oversight or scrutiny, and in doing so denied my clients the ability to contest the propriety, nature, and scope of the subpoena."

Having filed more than his fair share of Doe suits over the years and taken slings and arrows for his tactics, Freedman added: "There is nothing normal about this. Officers of the court have a duty of candor to the court and an obligation not to file fictitious lawsuits that have no basis in fact or law. A party with no connection to these proceedings asserting a breach of contract against another party they claim not to be able to identify does not qualify. This was done in bad faith and constitutes a flagrant abuse of process."

ADVERTISEMENT

On the other side, Lively's primary lawyers Esra Hudson and Mike Gottlieb not only acknowledge the Doe lawsuit but assert it is above board and the best way to get to the heart of the online attacks on their client that marred the summer 2024 premiere of the domestic violence-themed *It Ends With Us*.

DEADLINE

[TIP US](#)

“The Lively parties acted upon reliable information, and employed common tools such as Doe lawsuits and civil subpoenas that are entirely lawful and appropriate for pursuing claims and uncovering the identity of unknown perpetrators of unlawful activities, Hudson and Gottlieb go on to say, pointing out what the result was. “This lawsuit unearthed the Wayfarer Parties’ documented plan – in their own words, in their own text messages—to “destroy” Blake Lively, a plan which they executed without transparency, disclosure, or notice to Ms. Lively or the public, instead acting in a way they thought would be ‘untraceable’. We have absolutely nothing to hide – Ms. Lively voluntarily disclosed the subpoena in her first filing knowing that it would ultimately be produced to the Wayfarer Parties in discovery, and that is precisely what will happen as Ms. Lively’s claims move forward in the proper litigation process.”

ADVERTISEMENT

In a now-deleted Facebook post not long after Lively took the sexual harassment and smear campaign allegations public, Abel admitted she and Nathan “were prepared for it, as it’s our job to be ready for any scenario, but we didn’t have to implement anything, because the internet was doing the work for us” attacking the *Gossip Girl* alum. Still, the attacks on Lively last year were reminiscent of the successful online vilification of Amber Heard during Johnny Depp’s 2022 Nathan-assisted \$50 million defamation case against the *Aquaman* star. In the immediate fallout in this case, as well as public staining, Lively also saw a launch of her hair and liquor products timed to the *IEWU* release damaged by the online attacks, a first for the lucrative *A Simple Favor* star.

DEADLINE

[TIP US](#)

DEADLINE

Blake Lively at an 'It Ends With Us' event on August 8, 2024 in London

GARETH CATTERMOLE/GETTY IMAGES

With the multimillion-dollar case set for a March 9, 2026 trial start, Lively, *Deadpool*'s Reynolds, Sloane and the *New York Times* (who published its exposé “We Can Bury Anyone: Inside a Hollywood Smear Machine,” heavy with Nathan and Abel texts, one day after Lively’s December 20 CRD filing) are all trying to get themselves dismissed from Baldoni’s \$400 million defamation and extortion suit. Wrapped in the First Amendment, it looks pretty certain the *NYT* will soon be allowed out of the case that’s in Judge Lewis J. Liman’s courtroom.

ADVERTISEMENT

DEADLINE

[TIP US](#)

To Jones, who has her own suit with Abel, we don't know yet how Lively's team learned about the material that she had in her possession, though it seems there was some knowledge gleaned in late August. What we do know is that how that knowledge was gleaned will come out in declarations and testimony by Jones in the court case.

We also know that Jones received that Doe subpoena October 1.

Naming Lively, Reynolds and the couple's various companies and entities, the subpoena "concerns, refers, relates and applies to any and all electronic records, data, documents, and communications in Your possession, custody or control collected from a cellular telephone containing the requested information" from December 1, 2022 onward. That material was handed over not long afterwards, and the Vanzan suit was withdrawn December 19, one day before Lively's Civil Rights Department filing.

ADVERTISEMENT

There is no doubt that the subpoena to Jones, who was losing one of her key employees and more than a few clients as Abel opened her own PR shop, saw a plethora of communications that certainly indicated a coordinated attack on Lively to preempt any revelations about alleged misconduct by Baldoni.

Mindful of this latest twist, perhaps it is would not be a bad idea to remember the words of Liman back in March when he cautioned lawyers on all side to put this "feud between PR firms" in context.

The Daily Mail was first to report the Vanzan lawsuit filing.

READ MORE ABOUT:

[BLAKE LIVELY](#) / [BRYAN FREEDMAN](#) / [IT ENDS WITH US](#) / [JOHNNY DEPP](#) / [JUSTIN BALDONI](#) / [LIVELY-BALDONI](#)
/ [MELISSA NATHAN](#) / [RYAN REYNOLDS](#)

28 Comments

Subscribe to Deadline